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7	II C DICTDIC	T COURT	
8	U.S. DISTRICT COURT WESTERN DISTRICT OF WASHINGTON		
9	DONNA COPELAND, on behalf of herself and all others similarly situated,	NO 215 00505 MID	
10	Plaintiff,	NO. 2:15-cv-00585-MJP	
11	ŕ	STIPULATION AND [PROPOSED] ORDER OF DISMISSAL PURSUANT	
12	VS.	TO FEDERAL RULE OF CIVIL PROCEDURE 41(a)(1)(A)(ii)	
13	ALBION LABORATORIES, INC.; SEEKING HEALTH, LLC; and DESIGNS FOR HEALTH,		
14	INC.,	Note on Motion Calendar: February 29, 2016	
15	Defendants.		
16			
17			
18	I. STIPULA	ATION	
19	Plaintiff Donna Copeland and Defendants	Seeking Health, LLC and Designs for Health,	
20	Inc. (collectively, the "Parties"), by and through the	heir undersigned counsel of record, hereby	
21	stipulate as follows:		
22	WHEREAS Fed. R. Civ. P. 41(a) permits	the Parties to voluntarily dismiss an action	
23	without a court order by filing a stipulation of disa	missal signed by all parties who have	
24	appeared;		
25	WHEREAS this case has not been certified	d as a class action under Fed. R. Civ. P. 23;	
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	STIPULATION AND [PROPOSED] ORDER OF DISMISSAL PURSUANT TO FEDERAL RULE OF CIVI PROCEDURE 41(A)(1)(A)(II) - 1	TERRELL MARSHALL LAW GROUP PLLC 936 North 34th Street, Suite 300 Seattle, Washington 98103-8869 TEL. 206.816.6603 • FAX 206.350.3528	

CASE No. 2:15-CV-00585-MJP

1	WHEREAS the Parties have negotiated	a settlement of Plaintiff's individual claims		
2	only;			
3	THEREFORE the Parties agree and stip	ulate, pursuant to Federal Rule of Civil		
4	Procedure 41(a)(1)(A)(ii), that the above-captio	ned lawsuit shall be dismissed with prejudice as		
5	to Plaintiff's individual claims and without preju	udice as to the potential claims of any absent		
6	putative class members.			
7	IT IS SO STIPULATED.			
8	RESPECTFULLY SUBMITTED AND DATED this 29th day of February, 2016.			
9	TERRELL MARSHALL LAW	NEWMAN DU WORS LLP		
10	GROUP PLLC			
11				
12	By: /s/ Adrienne D. McEntee, WSBA #34061 Beth E. Terrell, WSBA #26759	By: /s/ Jake Bernstein, WSBA #39362 Derek Newman, WSBA#26967		
13	Email: bterrell@tmdwlaw.com	Email: dn@newmanlaw.com		
14	Adrienne D. McEntee, WSBA #34061 Email: amcentee@tmdwlaw.com	Jake Bernstein, WSBA #39362 Email: jake@newmanlaw.com		
15	936 North 34th Street, Suite 300 Seattle, Washington 98103-8869	2101 Fourth Avenue, Suite 1500 Seattle, Washington 98121		
16	Telephone: (206) 816-6603	Telephone: (206) 274-2800		
17	Kim E. Richman, Admitted Pro Hac Vice	Attorneys for Defendant Designs for Health,		
18	E-mail: krichman@richmanlawgroup.com THE RICHMAN LAW GROUP	Inc.		
19	195 Plymouth Street Brooklyn, New York 11201	SAVITT BRUCE & WILLEY LLP		
20	Telephone: (212) 687-8291	By: /s/ Miles A. Yanick, WSBA #26603		
21	Benjamin M. Lopatin, <i>Admitted Pro</i>	David N. Bruce, WSBA #15237 Email: dbruce@sbwllp.com		
22	Hac Vice E-mail: blopatin@elplawyers.com	Miles A. Yanick, WSBA #26603 Email: myanick@sbwllp.com		
	EGGNATZ, LOPATIN	Caitlin K. Hawks, WSBA#46669		
23	& PASCUCCI, LLP 580 California Street, Suite 1200	Email: chawks@sbwllp.com 1425 Fourth Avenue Suite 800		
24	San Francisco, California 94104	Seattle, Washington 98101-2272		
25	Attorneys for Plaintiff	Telephone: (206) 749-0500		
26		Attorneys for Defendant Seeking Health, LLC		
27				
	STIPULATION AND [PROPOSED] ORDER OF DISMISSAL PURSUANT TO FEDERAL RULE OF CI	VIL TERRELL MARSHALL LAW GROUP PLLC 936 North 34th Street, Suite 300		

STIPULATION AND [PROPOSED] ORDER OF DISMISSAL PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 41(A)(1)(A)(II) - 2 CASE No. 2:15-cv-00585-MJP

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II.	[PROPOSED] ORDER
IT IS SO ORDERED.	
DATED this day of _	, 2016.
	UNITED STATES DISTRICT JUDGE
FIPI II ATION AND (PROPOSED) ORF	DED OF
PLICATION AND IPROPOSEDIORI	JEK LIE

STIPULATION AND [PROPOSED] ORDER OF DISMISSAL PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 41(A)(1)(A)(II) - 3 CASE No. 2:15-cv-00585-MJP

4	CERTIFICATE OF SERVICE
1	
2	I, Adrienne D. McEntee, hereby certify that on February 29, 2016, I electronically filed
3	the foregoing with the Clerk of the Court using the CM/ECF system which will send
4	notification of such filing to the following:
5	Derek Newman, WSBA#26967
6	Email: dn@newmanlaw.com
7	Jake Bernstein, WSBA #39362 Email: jake@newmanlaw.com
8	NEWMAN DU WORS LLP
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9	Seattle, Washington 98121 Telephone: (206) 274-2800
10	Facsimile: (206) 274-2801
11	Attorneys for Defendant Designs for Health, Inc.
12	David N. Bruce, WSBA #15237
13	Email: dbruce@sbwllp.com
	Miles A. Yanick, WSBA #26603
14	Email: myanick@sbwllp.com
15	Caitlin K. Hawks, WSBA#46669 Email: chawks@sbwllp.com
1.0	SAVITT BRUCE & WILLEY LLP
16	1425 Fourth Avenue Suite 800
17	Seattle, Washington 98101-2272
18	Telephone: (206) 749-0500
	Facsimile: (206) 749-0600
19	Attorneys for Defendant Seeking Health, LLC
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STIPULATION AND [PROPOSED] ORDER OF DISMISSAL PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 41(A)(1)(A)(II) - 4 CASE No. 2:15-cv-00585-MJP

1	DATED this 29th day of February, 2016.
2	TERRELL MARSHALL LAW GROUP PLLC
3	By: /s/ Adrienne D. McEntee, WSBA #34061
4	Adrienne D. McEntee, WSBA #34061 Email: amcentee@tmdwlaw.com
5	936 North 34th Street, Suite 300 Seattle, Washington 98103
6	Telephone: (206) 816-6603
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8	Attorneys for Plaintiff
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